

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CHMURA ECONOMICS &)
ANALYTICS, LLC,)
Plaintiff/Counterclaim)
Defendant,) Case No. 3:19-cv-813-REP
v.)
RICHARD LOMBARDO,)
Defendant/Counterclaim)
Plaintiff.)

**PLAINTIFF'S CONSENT MOTION FOR LEAVE TO EXCEED PAGE LIMITATION
IN ITS BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Plaintiff and Counterclaim Defendant Chmura Economics & Analytics, LLC, by counsel, respectfully moves this Court for leave to exceed the page limitation set forth in Local Rule 7(F)(3) by ten pages in its forthcoming brief in support of motion for summary judgment. In support of this Motion, Chmura states as follows:

1. Local Rule 7(F)(3) provides that “[e]xcept for good cause shown in advance of filing, opening and responsive briefs, exclusive of affidavits and supporting documentation, shall not exceed thirty (30) 8-1/2 inch x 11 inch double-spaced ... pages.” Because Chmura anticipates that its forthcoming brief in support of motion for summary judgment will exceed thirty pages, Chmura respectfully requests leave of Court to exceed the page limitation.

2. Good cause exists for extending the page limitation. This case involves four claims by Chmura against Richard Lombardo and six counterclaims by Lombardo against Chmura, each of which encompasses numerous factual and legal issues. Given the number of claims and

counterclaims, Chmura will need more than thirty pages to adequately present all of these issues to the Court.

3. Chmura's counsel has conferred with Defendant's counsel regarding this Motion, and Defendant's counsel has consented to the relief Chmura seeks.

WHEREFORE, Chmura respectfully requests leave of Court to file a brief in support of its forthcoming motion for summary judgment of up to forty pages in length.

May 6, 2020

Respectfully submitted,

CHMURA ECONOMICS & ANALYTICS, LLC

By: _____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May, 2020 a copy of the foregoing was filed with the Court's CM/ECF system, which will send a notice of electronic filing (NEF) to all counsel of record.

/s/

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